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Ref No: DM-088/99

30 April, 1999

U.S. Department of Transportation Dockets
Docket No. FAA-1999-5401 -7
400Seventh Street SW
Room Plaza 401
Washington DC 20590

DEPT. OF TRANSPORTATION
Docket No. 1999-5401-7
APR 21 1999

Dear Sir/Madam,

BWIA operates 5 MD-80 aircraft ranging in age from 9 ½ to 12 ½ years. These aircraft have operated under an approved Maintenance Program, based on the aircraft MPD since new. The Maintenance specification has been approved both by the FAA and the CAA. Our facilities and procedures are reviewed and approved by the FAA and CAA on a regular basis and have always received their approval. Our records and manuals are also reviewed by the authorities during these audits. The leasing companies for these aircraft currently accomplish annual checks of the records and physical inspections of the aircraft annually. Another inspection by the authorities is just another unnecessary time consuming task.

Additionally, the aircraft manufacturers have several programs which have been mandated by the FAA and which BWIA complies with. The Aging Aircraft Collector Bulletin are being accomplished as they become due and the corrosion program has been incorporated into the Maintenance Specification. The SSI program and the repair assessment programs are due to be mandated on the fleet and existing repairs on the aircraft are due to be inspected for Damage Tolerance. Subsequently, the SRM repairs will be evaluated for Damage Tolerance.

BWIA does not have in house approval, as such all our repairs are approved by the manufacturer or their approved repair manuals. Also, 8 110-3 forms are available for all these repairs if requested from the manufacturer. Having an additional inspection by the FAA is only repetitive of what is currently done and would be of no benefit to BWIA or the industry.


Kimchand Rampaul
Vice president
Maintenance & Engineering